

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

HONEYWELL INTERNATIONAL INC. and
HONEYWELL INTELLECTUAL PROPERTIES INC.,)

Plaintiffs,)

v.)

APPLE COMPUTER, INC., *et al.*
Defendants.)

C.A. No. 04-1338-KAJ

DECLARATION

I, L. Thomas Heiser, declare as follows:

1. I am over the age of 21 and have personal knowledge of the facts stated in this declaration. If called as a witness, I could testify to those facts.

2. I am employed by Hitachi Electronic Devices (USA), Inc. ("HEDUS"). My title is Vice President & General Manager, Sales. My primary responsibility is LCD sales in the United States.

3. HEDUS does not build, assemble or otherwise manufacture LCD modules or their components, and has not done so in the past.

4. HEDUS only sells LCD modules obtained from Hitachi entities. HEDUS does not act as a sales representative or distributor for any company other than a Hitachi entity.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 27, 2006


L. Thomas Heiser